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ATTORNEYS FOR DEBTOR SUPERIOR AIR PARTS, INC.

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

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§	Case No. 08-36705
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§	Chapter 11
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DEBTOR'S MOTION FOR EXPEDITED HEARING ON DEBTOR'S UNOPPOSED MOTION TO SHORTEN NOTICE, SET DEADLINES, AND EXPEDITE HEARING DATE ON APPROVAL OF DISCLOSURE STATEMENT [DOCKET NO. 235]

- 1. Superior Air Parts, Inc. ("Debtor"), as debtor-in-possession, hereby requests that an expedited hearing be set on <u>June 22, 2009 at 9:00</u>, on Debtor's Unopposed Motion to Shorten Notice, Set Deadlines, and Expedite Hearing Date on Approval of Disclosure Statement [Docket No. 235]. The hearing should only take 5-10 minutes. The Debtor already has a hearing on its motion for summary judgment in Adversary Proceeding No. 09-03052 for that same date and time.
- 2. Hearing by such date is necessary because that will give 10 additional days for parties to review the Plan and Disclosure Statement, as amended before approval. The Disclosure Statement was filed and served on May 15, 2009, over 30

days ago. Shortening notice and the deadlines are warranted because time is of the essence to obtain confirmation of the Debtor's Plan. Several parties have expressed serious interest in participating in the auction process contemplated by the Plan. In addition, a scheduled insurance payment in excess of \$400,000 is due on or before August 1, 2009. The Debtor's estate is expected to deteriorate with delay and confirmation in July is beneficial to all parties involved. If the confirmation process is extended into August, the estate stands to lose a substantial amount of cash that could be paid by a Buyer under the Plan. The Disclosure Statement, as amended, needs to be approved and served with the Plan before the July 4th holiday weekend to allow sufficient time to give parties the required 25-day notice to review, object and to vote on the Plan, and to have a confirmation hearing before the end of July.

- 3. Proper notice of the proposed expedited hearing will be provided to the Official Committee of Unsecured Creditors, United States Trustee, Thielert AG and all parties listed on the attached Limited Service List.
- 4. A hearing was not requested earlier because all of the major constituencies were still in negotiations regarding and it just recently became apparent that an amended plan and disclosure statement would shortly follow.

WHEREFORE, the Debtor requests that the Court enter an Order setting an expedited hearing on the Motion and granting such other and further relief as this Court may deem just and proper.

Respectfully submitted,

/s/ Duane J. Brescia
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Bankruptcy Attorneys for the Debtor

CERTIFICATE OF CONFERENCE

The undersigned certifies that this motion is unopposed by the Official Committee of Unsecured Creditors, Thielert AG (the Debtor's sole owner major creditor) and the Office of the United States Trustee.

/s/ Duane J. Brescia
Duane J. Brescia

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document was served upon the parties on the attached Limited Service List via First Class U.S. Mail, postage prepaid on June 17, 2009.

/s/ Duane J. Brescia
Duane J. Brescia